

PSJ10 Exh 73

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 - - -

5 IN RE: NATIONAL : MDL NO. 2804
6 PRESCRIPTION OPIATE :
7 LITIGATION :

8 -----

9 : CASE NO.
10 THIS DOCUMENT : 1:17-MD-2804
11 RELATES TO ALL CASES:

12 : Hon. Dan A.
13 : Polster

14 - - -

15 Friday November 2, 2018

16 - - -

17 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
18 CONFIDENTIALITY REVIEW

19 - - -

20 Videotaped deposition of
21 JULIE SNYDER, taken pursuant to notice,
22 was held at the law offices of Lief
23 Cabraser Heimann & Bernstein, LLP, 250
24 Hudson Street, 8th Floor, New York, New
25 York 10013 beginning at 9:12 a.m., on the
26 above date, before Amanda Dee
27 Maslynsky-Miller, a Certified Realtime
28 Reporter.

29 - - -

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ALSO PRESENT:
21 Dan Lawlor, Videographer
22
23
24

1 there.

2 Q. And then Exhibit-5 is a
3 contract sales force agreement by and
4 between Ventiv Commercial Services and
5 Actavis Chadian LLC, correct?

6 A. A contract between Ventiv
7 and Actavis, yes.

8 Q. We may return to these
9 later. You can put them aside for now.
10 As a general matter, try to keep the
11 marked exhibits neat. So when we go back
12 to them, it will be easier to go back to.

13 I'm going to hand you what's
14 previously been marked Exhibit 1 from the
15 Allergan Kaufheld deposition.

16 Have you seen this document
17 before?

18 A. It looks familiar. I'm not
19 sure if I saw this exact one, but it
20 looks familiar.

21 Q. You know that you are
22 designated, on the second -- on the
23 second page, which is Page Number 1 of
24 this, to testify on behalf of the

1 corporate entity for a series of topics,
2 correct?

3 A. Yes.

4 Q. And you are prepared to
5 testify on those topics today?

6 A. Yes, I am prepared.

7 Q. What is the name of the
8 corporation you've been designated to
9 provide testimony on behalf of?

10 A. It's on behalf of Allergan,
11 I'm not clear on the exact corporate
12 structure. That wasn't part of my --
13 what I prepared for.

14 But my understanding is it's
15 Allergan. I believe Allergan Finance.

16 Q. Are you prepared to offer
17 testimony on behalf of Watson
18 Pharmaceuticals, Inc.?

19 A. On behalf of Watson?

20 MS. WELCH: Objection to the
21 extent you're asking her legal
22 questions. She's been designated
23 on behalf of Allergan Finance,
24 LLC. That's clear from the

1 pleading that you've put in front
2 of her.

3 MR. MELAMED: I was asking
4 the witness who she understands
5 she's been designated to testify
6 on.

7 MS. WELCH: And she answered
8 the question. And in response to
9 follow-up questions, I'm saying
10 it's clear, on behalf of the
11 pleading, who she's been
12 designated to testify on behalf
13 of.

14 MR. MELAMED: You're free to
15 object.

16 BY MR. MELAMED:

17 Q. Can you answer the question,
18 please?

19 A. Can you repeat the question?

20 Q. Sure.

21 Are you prepared to testify
22 on behalf of Watson Pharmaceuticals, Inc.
23 today?

24 MS. WELCH: Same objection.